

ExxonMobil Exploration Company

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RULES PROCESSING TEAM

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March 7, 2005

ExxonMobil
Exploration

Department of the Interior
Minerals Management Service
Attention: Rules Processing Team (RPT)
381 Elden Street, MS 4024
Herndon, Virginia 20170-4817

Attention: Rules Processing Team

**Re: Oil and Gas and Sulphur Operations on the
Outer Continental Shelf (OCS)
Suspension of Operations (SOO's) for
Ultra-Deep Drilling-AD09**

Ladies and Gentlemen:

ExxonMobil Exploration Company, a division of Exxon Mobil Corporation, submits this letter in response to the Mineral Management Service's call for comments published February 14, 2005, in the Federal Register (pp.7451 et seq.) regarding the proposed rule "Oil and Gas and Sulphur Operations on the Outer Continental Shelf (OCS)-Suspension of Operations (SOO's) for Ultra-Deep Drilling" ("Proposed Rule").

ExxonMobil supports the proposed revision of 30 CFR 250.175 which would allow the MMS to grant SOO's to lessees or operators who plan to drill ultra-deep wells located on leases with either a 5-year primary term, or an 8-year primary term with a requirement to drill within the first 5 years. ExxonMobil believes that both the technical complexities as well as the capital commitment required to successfully explore the most promising non-deepwater GOM exploration areas (e.g. sub-salt, deep gas) require more than the traditional five (5) year primary term under which most non-deepwater oil and gas leases are currently issued. While ExxonMobil continues to encourage the MMS to consider granting a primary term of ten (10) years in all new GOM leases, the proposed revision is certainly a welcome step toward providing industry with adequate time to pursue ultra-deep exploration opportunities.

ExxonMobil appreciates the opportunity to provide these comments on the Proposed Plan. Please do not hesitate to contact J. Byron Morris at 281.654.7051 should you have any questions or require any assistance.

Very truly yours,

Charlie Sheppard